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 Keast, Jeremy Tafelmeyer, Zachary Mahon,
 Megan Penneau, and Michael Minev*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

RONALD SANTOS,

Plaintiff,

v.

KENNETH ANNIKOS, *et al.*,

Defendant.

Case No. 3:23-cv-00281-MMD-CSD

**ORDER GRANTING
 DEFENDANTS' MOTION FOR
 EXTENSION OF TIME TO FILE
 MOTION FOR SUMMARY
 JUDGMENT
 (First Request)**

Defendants, Lorenzo Villegas, Jospeh Benson, Gaylene Fukagawa, John Keast, Jeremy Tafelmeyer, Zachary Mahon, Megan Penneau, and Michael Minev, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Kyle L. Hill, Deputy Attorney General, hereby move this Court for an extension of time to file a Motion for Summary Judgment. This is the first request to extend the subject deadline.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL ANALYSIS

This is a *pro se* prisoner 42 U.S.C. § 1983 civil rights claim brought by offender, Ronald Santos (Santos). On February 2, 2025, the Parties met for a hearing on Plaintiff's Motion to Compel (ECF No. 114) and Motion to Replace Deputy Attorney General (ECF No. 115). At the end of this hearing, the Court ordered Plaintiff to be permitted additional

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interrogatories for two Defendants and extended the discovery deadline to March 25, 2025 and the dispositive motion deadline to April 24, 2025.

On April 18, 2025, Plaintiff filed a Motion to Compel Discovery (ECF No. 150).

II. ARGUMENT

Defense counsel respectfully requests a sixty (60) day extension of time to file Defendants' dispositive motion from the current deadline of April 24, 2025, until June 23, 2025.

Defense Counsel has been diligently working on this matter, however, due to Plaintiff's recent filing of a Motion to Compel Discovery, and a need for this motion to be resolved prior to the filing of any dispositive motion, Defendants respectively request a continuation of the dispositive motion deadline in order to address Plaintiff's Motion to Compel (ECF No. 150).

A. Current Deadlines

Dispositive motion deadline: April 24, 2025

Joint pretrial order (if no dispositive motions filed): May 27, 2025

B. Proposed Deadlines

Dispositive motion deadline: June 23, 2025

Joint pretrial order (if no dispositive motions filed): July 23, 2025

C. Good Cause Supports this Request

Federal Rule of Civil Procedure 16(b) allows parties to request extensions of deadlines set in the Court's scheduling order. Good cause exists as follows for the extension. LR 26-3. Due to Plaintiff's recent filing of a Motion to Compel Discovery, and the need to have any disputes resolved prior to the filing of a dispositive motion, Defendants respectfully request an extension of the dispositive motion deadline of 60 days, or alternatively past a date where the Motion to Compel will likely be resolved.

Defendants assert that the requisite good cause is present to warrant the requested extension of time. This is the first request to extend the subject deadline.

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1 **III. CONCLUSION**

2 Defendants respectfully request this Court extend the deadline for dispositive
3 motion in this matter. Defendants assert the requisite good cause is present to warrant an
4 extension of time. Therefore, Defendants request additional time, up until **June 23, 2025**,
5 to file dispositive motions in this matter.

6 DATED this 21st day of April, 2025.

7 AARON D. FORD
8 Attorney General

9 By: /s/ Kyle L. Hill
10 KYLE L. HILL, Bar No. 16094
Deputy Attorney General

11 *Attorneys for Defendants*
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14 **ORDER**

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16 IT IS SO ORDERED.
17 Dated: April 21, 2025.

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UNITED STATES MAGISTRATE JUDGE
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